

**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

LUKE WAID AND MICHELLE RODRIGUEZ
Individually and as next friends of one minor
child,

Plaintiff,

Case No.: 2:16-CV-10444

v.

EDWARD KURTZ, in his individual and
official capacity; et al.

Defendant.

DEFENDANT EDWARD KURTZ'S RESPONSE TO THE FIRST AMENDED COMPLAINT

NOW COMES Defendant Edward Kurtz, by and through his attorneys, Simen, Figura & Parker, PLC by Michael J. Gildner and hereby states for his responses as follows:

1. Defendant Kurtz denies the allegations in Paragraph 1 for the reason that they are untrue regarding any conduct of Defendant Kurtz.
2. The allegations contained in Paragraph 2 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
3. Defendant Kurtz denies the allegations in Paragraph 3 for the reason that they are untrue regarding any conduct of Defendant Kurtz.
4. The allegations contained in Paragraph 4 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

5. The allegations contained in Paragraph 5 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
6. The allegations contained in Paragraph 6 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
7. The allegations contained in Paragraph 7 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
8. The allegations contained in Paragraph 8 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
9. The allegations contained in Paragraph 9 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

10. The allegations contained in Paragraph 10 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
11. The allegations contained in Paragraph 11 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
12. The allegations contained in Paragraph 12 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
13. The allegations contained in Paragraph 13 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
14. The allegations contained in Paragraph 14 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

15. The allegations contained in Paragraph 15 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
16. The allegations contained in Paragraph 16 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
17. The allegations contained in Paragraph 17 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
18. Defendant Kurtz denies the allegations in Paragraph 18 for the reason that they are untrue regarding any conduct of Defendant Kurtz.
19. Defendant Kurtz denies the allegations in Paragraph 19 for the reason that they are untrue regarding any conduct of Defendant Kurtz.
20. In answering Paragraph 20, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
21. In answering Paragraph 21, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.
22. In answering Paragraph 22, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

23. In answering Paragraph 23, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

24. In answering Paragraph 24, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

25. In answering Paragraph 25, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

26. Defendant Kurtz denies the allegations in Paragraph 26 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

27. Defendant Kurtz denies the allegations in Paragraph 27 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

28. Defendant Kurtz denies the allegations in Paragraph 28 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

29. Defendant Kurtz denies the allegations in Paragraph 29 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

30. Defendant Kurtz denies the allegations in Paragraph 30 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

31. In answering Paragraph 31, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

32. In answering Paragraph 32, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

33. Defendant Kurtz denies the allegations in Paragraph 33 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

34. The allegations contained in Paragraph 34 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz

lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

35. The allegations contained in Paragraph 35 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

36. The allegations contained in Paragraph 36 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

37. The allegations contained in Paragraph 37 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

38. The allegations contained in Paragraph 38 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

39. The allegations contained in Paragraph 39 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz

lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

40. The allegations contained in Paragraph 40 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

41. The allegations contained in Paragraph 41 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

42. The allegations contained in Paragraph 42 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

43. The allegations contained in Paragraph 43 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

44. The allegations contained in Paragraph 44 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz

lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

45. The allegations contained in Paragraph 45 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

46. The allegations contained in Paragraph 46 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

47. Defendant Kurtz denies the allegations in Paragraph 47 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

48. The allegations contained in Paragraph 48 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

49. The allegations contained in Paragraph 49 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

50. The allegations contained in Paragraph 50 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant

Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

51. The allegations contained in Paragraph 51 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

52. The allegations contained in Paragraph 52 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

53. The allegations contained in Paragraph 53 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

54. The allegations contained in Paragraph 54 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

55. The allegations contained in Paragraph 55 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz

lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

56. The allegations contained in Paragraph 56 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

57. The allegations contained in Paragraph 57 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

58. The allegations contained in Paragraph 58 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

59. The allegations contained in Paragraph 59 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

60. The allegations contained in Paragraph 60 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz

lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

61. The allegations contained in Paragraph 61 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

62. In answering Paragraph 62, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

63. In answering Paragraph 63, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

64. In answering Paragraph 64, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

65. In answering Paragraph 65, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

66. In answering Paragraph 66, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

67. In answering Paragraph 67, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

68. In answering Paragraph 78, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

69. In answering Paragraph 69, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

70. In answering Paragraph 70, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

71. The allegations contained in Paragraph 71 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

72. In answering Paragraph 72, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

73. The allegations contained in Paragraph 73 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

74. In answering Paragraph 74, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

75. In answering Paragraph 75, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

76. In answering Paragraph 76, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

77. In answering Paragraph 77, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

78. The allegations contained in Paragraph 78 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

79. The allegations contained in Paragraph 79 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

80. The allegations contained in Paragraph 80 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

81. The allegations contained in Paragraph 81 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

82. The allegations contained in Paragraph 82 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

83. In answering Paragraph 83, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

84. In answering Paragraph 84, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

85. The allegations contained in Paragraph 85 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant

Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

86. In answering Paragraph 86, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

87. In answering Paragraph 87, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

88. In answering Paragraph 88, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

89. In answering Paragraph 89, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

90. In answering Paragraph 90, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

91. In answering Paragraph 91, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

92. In answering Paragraph 92, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

93. The allegations contained in Paragraph 93 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

94. In answering Paragraph 94, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

95. In answering Paragraph 95, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

96. In answering Paragraph 96, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

97. In answering Paragraph 97, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

98. In answering Paragraph 98, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

99. In answering Paragraph 99, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

100. In answering Paragraph 100, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

101. In answering Paragraph 101, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

102. In answering Paragraph 102, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

103. In answering Paragraph 103, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

104. The allegations contained in Paragraph 104 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

105. In answering Paragraph 105, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

106. Defendant Kurtz denies the allegations in Paragraph 106 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

107. The allegations contained in Paragraph 107 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

108. The allegations contained in Paragraph 108 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

109. In answering Paragraph 109, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

110. The allegations contained in Paragraph 110 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

111. The allegations contained in Paragraph 111 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

112. The allegations contained in Paragraph 112 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required,

Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

113. In answering Paragraph 113, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

114. In answering Paragraph 114, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

115. In answering Paragraph 115, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

116. In answering Paragraph 116, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

117. In answering Paragraph 117, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

118. In answering Paragraph 118, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

119. The allegations contained in Paragraph 119 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

120. The allegations contained in Paragraph 120 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

121. In answering Paragraph 121, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

122. In answering Paragraph 122, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

123. The allegations contained in Paragraph 123 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

124. The allegations contained in Paragraph 124 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

125. The allegations contained in Paragraph 125 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

126. In answering Paragraph 126, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

127. In answering Paragraph 127, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

128. In answering Paragraph 128, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

129. In answering Paragraph 129, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

130. In answering Paragraph 130, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

131. The allegations contained in Paragraph 131 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

132. In answering Paragraph 132, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

133. In answering Paragraph 133, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

134. In answering Paragraph 134, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

135. In answering Paragraph 135, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

136. In answering Paragraph 136, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

137. The allegations contained in Paragraph 137 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

138. In answering Paragraph 138, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

139. In answering Paragraph 139, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

140. The allegations contained in Paragraph 140 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

141. The allegations contained in Paragraph 141 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

142. The allegations contained in Paragraph 142 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

143. The allegations contained in Paragraph 143 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

144. In answering Paragraph 144, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

145. The allegations contained in Paragraph 145 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required,

Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

146. The allegations contained in Paragraph 146 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

147. In answering Paragraph 147, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

148. The allegations contained in Paragraph 148 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

149. The allegations contained in Paragraph 149 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

150. The allegations contained in Paragraph 150 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

151. The allegations contained in Paragraph 151 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason,

Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

152. The allegations contained in Paragraph 152 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

153. The allegations contained in Paragraph 153 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

154. The allegations contained in Paragraph 154 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

155. In answering Paragraph 155, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

156. In answering Paragraph 156, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

157. In answering Paragraph 157, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

158. In answering Paragraph 158, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

159. In answering Paragraph 159, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

160. In answering Paragraph 160, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

161. In answering Paragraph 161, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

162. In answering Paragraph 162, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

163. In answering Paragraph 163, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

164. In answering Paragraph 164, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

165. In answering Paragraph 165, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

166. In answering Paragraph 166, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

167. The allegations contained in Paragraph 167 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

168. The allegations contained in Paragraph 168 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

169. The allegations contained in Paragraph 169 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

170. The allegations contained in Paragraph 170 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

171. The allegations contained in Paragraph 171 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

172. In answering Paragraph 172, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

173. In answering Paragraph 173, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

174. In answering Paragraph 174, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

175. The allegations contained in Paragraph 175 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

176. The allegations contained in Paragraph 176 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

177. The allegations contained in Paragraph 177 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

178. The allegations contained in Paragraph 178 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

179. The allegations contained in Paragraph 179 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

180. In answering Paragraph 180, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

181. In answering Paragraph 181, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

182. In answering Paragraph 182, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

183. In answering Paragraph 183, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

184. In answering Paragraph 184, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

185. The allegations contained in Paragraph 185 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

186. The allegations contained in Paragraph 186 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

187. In answering Paragraph 187, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

188. In answering Paragraph 188, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

189. In answering Paragraph 189, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

190. In answering Paragraph 190, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

191. In answering Paragraph 191, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

192. In answering Paragraph 192, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

193. The allegations contained in Paragraph 193 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

194. In answering Paragraph 194, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

195. The allegations contained in Paragraph 195 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

196. In answering Paragraph 196, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

197. In answering Paragraph 197, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

198. In answering Paragraph 198, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

199. In answering Paragraph 199, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

200. The allegations contained in Paragraph 200 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

201. The allegations contained in Paragraph 201 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

202. In answering Paragraph 202, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

203. In answering Paragraph 203, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

204. In answering Paragraph 204, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

205. In answering Paragraph 205, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

206. Defendant Kurtz denies the allegations in Paragraph 206 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

207. In answering Paragraph 207, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

208. In answering Paragraph 208, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

209. In answering Paragraph 209, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

210. In answering Paragraph 210, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

211. In answering Paragraph 211, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

212. In answering Paragraph 212, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

213. In answering Paragraph 213, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

214. In answering Paragraph 214, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

215. In answering Paragraph 215, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

216. In answering Paragraph 216, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

217. Defendant Kurtz denies the allegations in Paragraph 217 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

218. In answering Paragraph 218, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

219. In answering Paragraph 219, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

220. In answering Paragraph 220, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

221. In answering Paragraph 221, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

222. Defendant Kurtz denies the allegations in Paragraph 222 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

223. Defendant Kurtz denies the allegations in Paragraph 223 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

224. In answering Paragraph 224, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

225. In answering Paragraph 225, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

226. In answering Paragraph 226, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

227. In answering Paragraph 227, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

228. In answering Paragraph 228, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

229. In answering Paragraph 229, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

230. In answering Paragraph 230, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

231. In answering Paragraph 231, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

232. In answering Paragraph 232, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

233. Defendant Kurtz denies the allegations in Paragraph 233 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

234. In answering Paragraph 234, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

235. In answering Paragraph 235, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

236. In answering Paragraph 236, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

237. In answering Paragraph 237, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

238. In answering Paragraph 238, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

239. In answering Paragraph 239, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

240. In answering Paragraph 240, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

241. In answering Paragraph 241, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

242. In answering Paragraph 242, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

243. In answering Paragraph 243, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

244. In answering Paragraph 244, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

245. In answering Paragraph 245, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

246. In answering Paragraph 246, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

247. Defendant Kurtz denies the allegations in Paragraph 247 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

248. In answering Paragraph 248, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

249. In answering Paragraph 249, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

250. In answering Paragraph 250, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

251. In answering Paragraph 251, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

252. In answering Paragraph 252, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

253. Defendant Kurtz denies the allegations in Paragraph 253 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

254. Defendant Kurtz denies the allegations in Paragraph 254 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

206. Defendant Kurtz incorporates by reference his responses to the allegation is contained in paragraphs 1 – 254 above.

207. In answering Paragraph 207, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

208. In answering Paragraph 208, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

209. Defendant Kurtz denies the allegations in Paragraph 209 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

210. Defendant Kurtz denies the allegations in Paragraph 210 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

211. In answering Paragraph 211, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

212. Defendant Kurtz denies the allegations in Paragraph 212 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

213. Defendant Kurtz denies the allegations in Paragraph 213 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

214. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 214 above.

215. Defendant Kurtz denies the allegations in Paragraph 215 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

216. Defendant Kurtz denies the allegations in Paragraph 216 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

217. In answering Paragraph 217, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

218. In answering Paragraph 218, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

219. In answering Paragraph 219, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

220. In answering Paragraph 220, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

221. Defendant Kurtz denies the allegations in Paragraph 221 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

222. Defendant Kurtz denies the allegations in Paragraph 222 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

223. In answering Paragraph 223, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

224. In answering Paragraph 224, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

225. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 224 above.

226. Defendant Kurtz denies the allegations in Paragraph 226 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

227. In answering Paragraph 227, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

228. In answering Paragraph 228, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

229. Defendant Kurtz denies the allegations in Paragraph 229 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

230. Defendant Kurtz denies the allegations in Paragraph 230 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

231. The allegations contained in Paragraph 231 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

232. Defendant Kurtz denies the allegations in Paragraph 232 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

233. Defendant Kurtz denies the allegations in Paragraph 233 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

234. Defendant Kurtz denies the allegations in Paragraph 234 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

235. Defendant Kurtz denies the allegations in Paragraph 235 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

255. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 235 above.

256. Defendant Kurtz denies the allegations in Paragraph 256 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

257. Defendant Kurtz denies the allegations in Paragraph 257 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

258. Defendant Kurtz denies the allegations in Paragraph 258 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

259. Defendant Kurtz denies the allegations in Paragraph 259 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

260. Defendant Kurtz denies the allegations in Paragraph 260 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

261. Defendant Kurtz denies the allegations in Paragraph 261 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

262. Defendant Kurtz denies the allegations in Paragraph 263 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

263. Defendant Kurtz denies the allegations in Paragraph 264 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

264. The allegations contained in Paragraph 265 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

265. Defendant Kurtz denies the allegations in Paragraph 265 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

266. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 265 above.

267. Defendant Kurtz denies the allegations in Paragraph 267 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

268. Defendant Kurtz denies the allegations in Paragraph 268 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

269. Defendant Kurtz denies the allegations in Paragraph 269 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

270. Defendant Kurtz denies the allegations in Paragraph 270 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

271. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 270 above.

272. Defendant Kurtz denies the allegations in Paragraph 272 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

273. Defendant Kurtz denies the allegations in Paragraph 273 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

274. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 273 above.

275. Defendant Kurtz denies the allegations in Paragraph 275 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

276. In answer Paragraph 276, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

277. Defendant Kurtz denies the allegations in Paragraph 277 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

278. Defendant Kurtz denies the allegations in Paragraph 278 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

279. Defendant Kurtz denies the allegations in Paragraph 279 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

280. In answering Paragraph 280, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

281. Defendant Kurtz denies the allegations in Paragraph 281 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

282. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 282 above.

283. Defendant Kurtz denies the allegations in Paragraph 283 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

284. Defendant Kurtz denies the allegations in Paragraph 284 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

285. Defendant Kurtz denies the allegations in Paragraph 285 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

286. Defendant Kurtz denies the allegations in Paragraph 286 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

287. Defendant Kurtz denies the allegations in Paragraph 287 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

288. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 287 above.

289. Defendant Kurtz denies the allegations in Paragraph 289 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

290. Defendant Kurtz denies the allegations in Paragraph 290 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

291. Defendant Kurtz denies the allegations in Paragraph 291 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

292. Defendant Kurtz denies the allegations in Paragraph 292 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

293. Defendant Kurtz denies the allegations in Paragraph 293 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

294. Defendant Kurtz denies the allegations in Paragraph 294 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

295. Defendant Kurtz denies the allegations in Paragraph 295 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

296. Defendant Kurtz denies the allegations in Paragraph 296 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

297. Defendant Kurtz denies the allegations in Paragraph 297 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

298. Defendant Kurtz denies the allegations in Paragraph 298 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

299. Defendant Kurtz denies the allegations in Paragraph 299 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

300. Defendant Kurtz incorporates by reference his response to the allegations contained in paragraphs 1 – 299 above.

301. In answering Paragraph 301, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

302. Defendant Kurtz denies the allegations in Paragraph 302 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

303. The allegations contained in Paragraph 303 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

304. Defendant Kurtz denies the allegations in Paragraph 304 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

305. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 304 above.

306. Defendant Kurtz denies the allegations in Paragraph 306 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

307. Defendant Kurtz denies the allegations in Paragraph 307 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

308. Defendant Kurtz denies the allegations in Paragraph 308 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

309. The allegations contained in Paragraph 309 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

310. Defendant Kurtz denies the allegations in Paragraph 310 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

311. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 310 above.

312. Defendant Kurtz denies the allegations in Paragraph 312 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

313. Defendant Kurtz denies the allegations in Paragraph 313 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

314. Defendant Kurtz denies the allegations in Paragraph 314 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

315. Defendant Kurtz denies the allegations in Paragraph 315 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

316. Defendant Kurtz denies the allegations in Paragraph 316 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

317. Defendant Kurtz denies the allegations in Paragraph 317 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

318. In answering Paragraph 318, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

319. Defendant Kurtz denies the allegations in Paragraph 319 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

320. Defendant Kurtz denies the allegations in Paragraph 320 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

321. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 320 above.

322. The allegations contained in Paragraph 322 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

323. The allegations contained in Paragraph 323 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

324. The allegations contained in Paragraph 324 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

325. The allegations contained in Paragraph 325 are directed to and within the knowledge of one or more Defendants other than Defendant Kurtz, and for that reason, Defendant Kurtz declines to answer. To the extent that a response is required, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

326. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 325 above.

327. Defendant Kurtz denies the allegations in Paragraph 327 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

328. Defendant Kurtz denies the allegations in Paragraph 328 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

329. Defendant Kurtz denies the allegations in Paragraph 329 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

330. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 329 above.

331. Defendant Kurtz denies the allegations in Paragraph 331 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

332. In answering Paragraph 332, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

333. Defendant Kurtz denies the allegations in Paragraph 333 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

334. Defendant Kurtz denies the allegations in Paragraph 334 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

335. In answering Paragraph 335, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

336. In answering Paragraph 336, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

337. In answering Paragraph 337, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

338. Defendant Kurtz denies the allegations in Paragraph 338 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

339. In answering Paragraph 339, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

340. In answering Paragraph 340, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

341. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 340 above.

342. Defendant Kurtz denies the allegations in Paragraph 342 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

343. Defendant Kurtz denies the allegations in Paragraph 343 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

344. Defendant Kurtz denies the allegations in Paragraph 344 for the reason that they are untrue regarding any conduct of Defendant Kurtz.

345. Defendant Kurtz incorporates by reference his responses to the allegations contained in paragraphs 1 – 344 above.

346. In answering Paragraph 346, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

347. In answering Paragraph 347, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

348. In answering Paragraph 348, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

349. In answering Paragraph 349, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

350. In answering Paragraph 350, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

351. In answering Paragraph 351, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

352. In answering Paragraph 352, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

353. In answering Paragraph 353, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

354. In answering Paragraph 354, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

355. In answering Paragraph 355, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

356. In answering Paragraph 356, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

357. In answering Paragraph 357, Defendant Kurtz lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

AFFIRMATIVE DEFENSES

NOW COMES Defendant Edward Kurtz, by and through his attorneys Simen, Figura & Parker, PLC by Michael J. Gildner, and gives notes that he will assert the following affirmative defenses:

1. Plaintiffs' claims are barred as to Defendant Kurtz by Governmental immunity;
2. Plaintiffs have failed to state a claim in whole or in part upon which relief may be granted and therefore, Defendant Kurtz is entitled to summary disposition as a matter of law.

3. Defendant Kurtz reserves the right to amend its affirmative defenses and include additional affirmative defenses as they become known and necessary during the course of discovery and prior to trial.

Respectfully submitted,

Simen, Figura & Parker, PLC

/s/ Michael J. Gildner
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Dated: December 23, 2016